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16 **UNITED STATES DISTRICT COURT**

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**DISTRICT OF NEVADA**

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KEVIN DROVER, individually and on behalf  
of all others similarly situated,

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Plaintiffs,

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vs.  
LG ELECTRONICS USA, INC.,

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Defendant.

22 Case No.: 2:12-cv-00510-JCM-VCF

**DEFENDANT LG ELECTRONICS USA,  
INC.'S NOTICE OF CONDITIONAL  
NON-OPPOSITION TO PLAINTIFF'S  
MOTION FOR LEAVE TO FILE A  
FIRST AMENDED COMPLAINT**

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Defendant LG Electronics USA, Inc. ("LGUSA") hereby files its Notice of Conditional  
24 Non-Opposition to Plaintiff Kevin Drover's Motion for Leave to file a First Amended Complaint  
(Dkt. # 65). LGUSA does not oppose Plaintiff's Motion and consents to the filing of the First  
25 Amended Complaint, provided however that LGUSA does not thereby concede that the First  
Amended Complaint states a claim for relief and further provided that LGUSA reserves its right  
26 to move to dismiss the First Amended Complaint under Rules 8, 9(b) and 12(b)(6) of the Federal  
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1 Rules of Civil Procedure. LGUSA further provides notice that it will move to dismiss the First  
2 Amended Complaint by the later of (1) two business days following the filing of the First  
3 Amended Complaint or (2) August 22, 2013.

4 DATED this 16th day of August, 2013.

5 McDONALD CARANO WILSON LLP

6 By: /s/ Kristen T. Gallagher  
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20 Attorneys for Defendant LG ELECTRONICS USA, INC.  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I am an employee of McDonald Carano Wilson LLP, and that on this 16th day of August, 2013, I caused a true and correct copy of the foregoing **DEFENDANT LG ELECTRONICS USA, INC.'S NOTICE OF CONDITIONAL NON-OPPOSITION TO PLAINTIFF'S MOTION FOR LEAVE TO FILE A FIRST AMENDED COMPLAINT** to be served via the U.S. District Court's Notice of Electronic Filing ("NEF") in the above-captioned case, upon the following:

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